

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

GREAT NORTHERN INSURANCE COMPANY,
as subrogee of Juan A. Rodriguez Vila and
Iwalani Rodriguez

Plaintiff

V.

EL LEGADO PROPERTY MANAGEMENT
COMPANY, INC.

and

EL LEGADO DE CHI CHI RODRIGUEZ GOLF
RESORT, INC.

and

EL LEGADO DE CHI CHI RODRIGUEZ GOLF
RESORT, (SC) SE

and

EL LEGADO HOMEOWNER'S ASSOCIATION, INC.,
and EL LEGADO CONDOMINIUM, REGIME I

Defendants

Civil Action No. 11-01303-(DRD)

RE: NEGLIGENCE, BREACH OF
CONTRACT, & BREACH OF
WARRANTY

MOTION TO CLARIFY RELATIONSHIP AND RESPONSIBLE PARTIES

TO THE HONORABLE COURT:

COMES NOW, Mr. Pedro Rivera Casiano, through the undersigned counsel, and without submitting to the jurisdiction of this Honorable Court, respectfully states as follows:

The appearing person is the president of El Legado Homeowners Association, Inc. The homeowners association was served with summons, and has appeared through counsel and answered the complaint.

The appearing parties, however, is not related to, or holds any position in El Legado Condominium, Regimen I. The summons served on Mr. Rivera Casiano on behalf of El Legado Condominium Regimen I, are ineffective. By the same token, the interrogatories and request for production of documents will only be replied as to the Homeowners Association.

WHEREFORE, Pedro Rivera Casiano respectfully requests from this Honorable Court to be so informed.

I HEREBY CERTIFY that a copy of the foregoing motion was filed with the clerk of the US District Court for the District of Puerto Rico electronically using the CM/ECF system, which automatically serves notification upon counsel for the parties that have appeared in the proceeding.

San Juan, Puerto Rico, this 21st day of January 2012.

/s/CARLOS E. RODRIGUEZ QUESADA, ESQ.
USDC-PR# 124810
PO BOX 9023115
San Juan, PR 00902-3115
TEL. (787)724-2367 FAX (787)724-2463
cerqlaw@coqui.net